

To: StClair, Christie[StClair.Christie@epa.gov]
From: Grantham, Nancy
Sent: Tue 3/15/2016 8:16:48 PM
Subject: RE: Denver Post (ddl cob): NPL

Yes .. thanks

From: StClair, Christie
Sent: Tuesday, March 15, 2016 2:51 PM
To: Grantham, Nancy <Grantham.Nancy@epa.gov>
Subject: Denver Post (ddl cob): NPL

Nancy, all of this info comes from the Daily Caller responses, that were previously approved by OLEM and R8. OK to send to Bruce now?

Christie

1. When is EPA likely to add the Animas (Bonita) site to the superfund list?

The agency is deliberating on proposing the Bonita Peak Mining District to the NPL in the next NPL update, which is scheduled for late March or early April.

2. Have EPA officials proposed a superfund listing (following receipt of the governor's posture)? If so, when?

See first response.

3. How much are they requesting?

It is premature to speculate on costs for cleanup, since a remedy has not yet been selected.

Here's some additional info on the listing process you may find useful:

When EPA issues a rule proposing to add a site to the NPL, the Agency publishes the rule and a public comment notice about its intention in the Federal Register and issues a public notice through the local media to notify the community, so interested members of the community can comment on the proposal. EPA then responds to the comments it receives. If, after the formal comment period, the site still qualifies for cleanup under Superfund, it is listed on the NPL through another rulemaking.-

The first step following NPL listing is the development and implementation of a plan for a detailed, comprehensive investigation into the contamination sources (called a Remedial Investigation) followed by the development of feasible cleanup alternatives (called a Feasibility Study).

The EPA has contracts in place to begin this work immediately after the site is proposed to the NPL.

The remedial investigation serves as the mechanism for collecting data to:

- characterize site conditions;
- determine the nature of the waste;
- assess risk to human health and the environment; and
- conduct treatability testing to evaluate the potential performance and cost of the treatment technologies that are being considered.

The FS is the mechanism for the development, screening, and detailed evaluation of alternative remedial actions.

The RI and FS are conducted concurrently - data collected in the RI influence the development of remedial alternatives in the FS, which in turn affect the data needs and scope of treatability studies and additional field investigations. This phased approach encourages the continual scoping of the site characterization effort, which minimizes the collection of unnecessary data and maximizes data quality.

Initial investigation work in the Bonita Peak Mining District has been done through the previous efforts of EPA, Bureau of Land Management, U.S. Forest Service and the Animas River Stakeholder Group. EPA would work with the communities and stakeholders and look carefully at this existing information in determining the additional investigation needed. EPA takes public input on a proposed cleanup plan.

Once a remedy is selected (called Record of Decision), it is designed and the cleanup work (called remedial action) begins. Community involvement, interim actions (such as, mine portal stabilizations and bulkhead installations), and potential enforcement actions occur throughout the entire process. **It is premature to speculate on costs for cleanup, since a remedy has not yet been selected.**

If warranted, removal actions, short-term responses used to handle threats of releases, may be taken at any step of the process to ensure public safety. For example, EPA took early removal actions to address imminent threats at 35 percent of hardrock mining or mineral processing NPL sites prior to their being added to the NPL. The length of time it takes for remedial action to begin depends on a variety of site-specific factors.

In the case of the Bonita Peak Mining District, we expect to move quickly into the investigations needed to begin identifying appropriate clean up actions.

EPA has work plans in place for additional sampling this summer and fall that will be part of the remedial investigation that will serve to further delineate the nature and extent of the contamination.

4. What work is being done, if any, to stabilize the GKM portal now that snow is melting away? 4) What is the latest estimated gallons-per-minute flow rate from GK mine? What about Red and Bonita and Mogul? Others in the group of 48?

Operations at the Gold King Mine will resume as early as possible in the late spring/early summer, dependent upon road conditions and any remaining avalanche hazards around the mine (which can extend into May). We expect the primary objective at this time to be completing work to stabilize the first 60 feet of the adit and constructing the temporary low-head flow control structure. The extent to which additional rehabilitation work (mucking solids and ground support) is continued into the mine remains to be determined.

Regarding the temporary low-head flow control structure, the primary purpose for this steel structure, located approximately 60 ft inside the adit, will be to provide a control for potential surges of flow that might develop in the short-term (3 to 5 years). It will be capable of impounding an increased water level within the mine while containing the increased flow within the piping system exiting the mine. The flow control system will include instrumentation to remotely monitor water levels behind the structure. The flow control structure can be replaced and/or removed when necessary to conduct work beyond that point in the mine adit.

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